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UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

CLERK, U.S. DISTRICT COURT
MINNEAPOLIS, MINNESOTA

Haishan Yang

Plaintiff(s),

vs.

Case No. 25-cv-89-JMB/SGE

University of Minnesota

Defendant(s),

MOTION TO/FOR

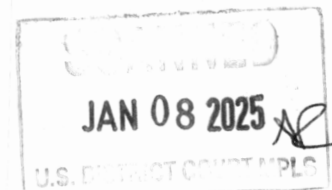
(Provide basis for Motion)

The following party/parties (insert the names of all parties who are filing the Motion): Haishan Yang in the above-named case hereby move(s) the United States District Court, District of Minnesota for an Order to: (state what you want the Court to order)

Requesting a preliminary injunction to prohibit the University of Minnesota (UMN) from enforcing its decision to expel the Plaintiff, pending resolution of the case.

because:

(In numbered paragraphs, **briefly** list main reasons the Motion should be granted. Attach additional sheets of paper if necessary; more detail must be provided in a Memorandum of Law accompanying the Motion.)



1. The Plaintiff is an international student and a third-year Ph.D. student at the University of Minnesota (UMN). The enforcement of the expulsion would cause immediate and irreparable harm, including the loss of visa status, the loss of the Plaintiff's research assistantship (their primary source of income), and significant disruption to ongoing academic and professional research collaborations.
2. The Plaintiff's expulsion is premised on a fundamentally flawed process that violated the Plaintiff's Fourteenth Amendment due process rights. Specifically, the University relied on altered evidence, denied the Plaintiff sufficient time to review critical evidence, and made credibility determinations based on incomplete and manipulated records.
3. The Plaintiff has demonstrated a substantial likelihood of success on the merits of their case, as the Defendant's actions constitute significant procedural violations. These include the use of altered ChatGPT-generated evidence without proper disclosure or verification, which undermines the fairness and integrity of the disciplinary process.
4. The balance of equities strongly favors the Plaintiff. Granting this motion will preserve the status quo, allowing the Plaintiff to continue pursuing their Ph.D. program and maintaining their legal immigration status while the Court reviews the matter. This will prevent irreparable harm to the Plaintiff and ensure no undue prejudice to the Defendant.
5. Finally, granting this motion aligns with the public interest by ensuring that public universities, as state actors, uphold constitutional due process protections in their disciplinary proceedings. Protecting these rights is essential to maintaining the integrity and fairness of higher education institutions.

6. For these reasons, the Plaintiff respectfully requests that the Court grant a preliminary injunction to prohibit UMN from enforcing the expulsion decision pending the resolution of this case.

Said Motion is based upon the attached Memorandum of Law, forensic analysis by Nick Huntington-Klein (identify all other supporting documents that are being submitted with the Motion, if any) and all of the files, records, and proceedings herein.

Signed this 8th day of January, 2025.

Signature of Party _____

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United States

Telephone Number 4359321198

Note: All parties filing the Motion must date and sign the Motion and provide his/her mailing address and telephone number. Attach additional sheets of paper as necessary. The Motion must be served on each party, together with the Notice of Hearing, the Memorandum of Law and other accompanying documents, if any.